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Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus,
MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

August 6, 2013

Honorable Commissioners:

Pasadena Community Access Corporation submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Pasadena Community Access Corporation is a 501(c)3 whose purpose is to promote, coordinate, facilitate, produce and assist public service programming on behalf of all Pasadena public and community access channels. We operate Pasadena's community media training center and television studio as well as oversee the four local television channels: KPAS - City of Pasadena's Government Access, The Arroyo Channel - Pasadena's Local Community Access, KLRN - Pasadena Unified School District's Educational Access and PCCTV - Pasadena City College's Educational Access. The thousands of hours of programming we provide each year is available to approximately 20,000 cable subscriber households in Pasadena, California as well as subscribers in several surrounding communities.

We have program descriptions readily available for our programs, but the onscreen video programming guide of our incumbent multichannel video programming distributor (MVPD), Charter Communications, does not display these descriptions. Instead, the four channels are listed as "GOV," "PACCS," "KLRND" and "PCCTV." Each of these channels has a single generic program title listed (i.e. "Local Government Access," "Public Access," and "KLRN: Pasadena USA") except for PCCTV, which has a blank title line and displays "No data available" upon selection. This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

Our community is also served by AT&T's U-verse multichannel video service, which has created unique and especially difficult problems for visually-impaired viewers wishing to view PEG channel programming that are discussed in the comments filed by the Alliance for Communications Democracy, the Alliance for Community Media and Chicago Access Corporation (CAN TV). Unlike the linear PEG channels on our incumbent cable operator's system, which the visually impaired can reach simply by remembering the right channel number (i.e. 3, 32, 95 or 96), with AT&T's PEG product the visually impaired must somehow, after selecting channel 99, figure out how to navigate a series of visual menus and sub-menus to reach any PEG channels. The more PEG channels in the DMA and the more PEG channels in each jurisdiction, the more sub-menus the visually-impaired

must somehow figure out how to “see” and navigate. In our area, AT&T has 36 different local jurisdictions, and a total of 53 different PEG channels, on its “channel 99” PEG application. As a result, a visually-impaired subscriber, after inputting channel 99 and waiting for it to load, must somehow navigate a visual menu of 36 different local community jurisdictions, find and select the correct one, and then navigate a sub-menu of our four different PEG channels and find and press the correct one to reach one of our PEG channels. This menu-based system also prevents any DVR capabilities for those that would want to record a program for viewing later. Moreover, the AT&T PEG product’s lack of a truly effective “last channel” function for PEG creates yet more problems for the visually impaired if they wish to switch to or from a PEG channel from or to a non-PEG channel.

In short, the visually impaired are genuinely, and dramatically, disadvantaged compared to the non-visually impaired in accessing, and being able to have the same functionality with respect to, our PEG channels on AT&T’s U-verse system.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,
Chris Miller
Chief Operations Officer
Pasadena Community Access Corporation